

# THE WEITZ LAW FIRM, P.A.

Bank of America Building  
18305 Biscayne Blvd., Ste 214  
Aventura, Florida 33160

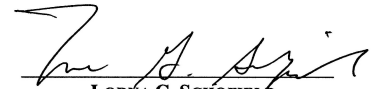
July 7, 2020

Application GRANTED. The time to complete service is extended to August 8, 2020. The initial conference set for July 16, 2020, at 10:30 A.M. is adjourned to September 10, 2020, at 10:30 A.M.

**VIA CM/ECF**

Honorable Judge Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square - Courtroom 1106  
New York, New York 10007

Dated: July 8, 2020 New York New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

**Re: Girotto v. Fortunato O Frederico & CA LDA, d/b/a Fly London, et al.-  
Case 1:20-cv-01998-LGS**

Dear Judge Schofield:

The undersigned represents the Plaintiff in the above-captioned case matter.

The Initial Pretrial Conference in this matter is currently scheduled for July 16, 2020, at 10:30 a.m., in Your Honor's Courtroom. Due to the Covid-19 pandemic, and the consequential reduction of staff and limited hours of our process server, as well as the logistical limitations on their ability to serve in New York City due to the recently expired eighty-day lockdown mandate, service of process was unexpectedly delayed, and undersigned counsel was subsequently provided the corresponding Affidavits of Service late from the process server.

We have since been notified by former counsel for the Tenant/Defendant Fortunato O Frederico & CA LDA, who was served by the process server, that he is not their authorized registered agent and/or authorized counsel and that said Tenant/Defendant needs to be reserved. Said Tenant/Defendant Fortunato O Frederico & CA LDA is a Portuguese company, and will need to be served via the Hague Convention, despite our best efforts to inform their principals/managers of this pending suit via multiple emails and Federal Express (enclosing courtesy copies of the Complaint and the Court's Order regarding the Conference). We have also made extensive efforts to locate any New York based registered agent for said Tenant/Defendant, but unfortunately none exist. Despite our good-faith attempts, we have received no response to date, and will need to undertake the time consuming and expensive process of translating the Complaint and Amended Summons into Portuguese and then serve said Tenant/Defendant via the Hague Convention. Consequently, we have since requested, and have been issued, an Amended Summons [D.E. 20] for said Tenant/Defendant.

This significant complication and ensuing delay was unforeseen, and therefore, Plaintiff and undersigned counsel hereby respectfully request an adjournment of the Initial Pretrial Conference for sixty (60) days (or *sine die*), and a thirty (30) day extension of time to properly serve said Tenant/Defendant via the aforementioned extensive process through the Hague Convention. Thank you for your consideration of this unexpected request.

Sincerely,

By: /S/ B. Bradley Weitz

B. Bradley Weitz, Esq. (BW9365)

THE WEITZ LAW FIRM, P.A.

Attorney for Plaintiff

Bank of America Building

18305 Biscayne Blvd, Ste. 214

Aventura, Florida 33160

Telephone: (305) 949-7777

Facsimile: (305) 704-3877

Email: bbw@weitzfirm.com